

EXHIBIT 2

INITIAL ASSESSMENT FORM

I. SITE NAME AND LOCATION

01 SITE NAME Grease pit south of CPP-637.		02 ADDRESS Idaho National Engineering Laboratory (INEL)	
03 CITY Scoville	04 STATE Idaho	05 ZIP CODE 83403	06 COUNTY Butte
09 COORDINATES: NORTH 6 9 5 2 5 0		EAST 2 9 6 1 2 5	
07 COUNTY CODE		08 CONG. DIST.	
10 DIRECTIONS TO SITE (Starting from nearest public road) N. on Lincoln Blvd.; E. on Cleveland Ave.			

II. OWNER/OPERATOR

01 OWNER (If known) Department of Energy (DOE)		02 STREET ADDRESS 785 DOE Place	
03 CITY Idaho Falls	04 STATE Idaho	05 ZIP CODE 83402	06 TELEPHONE NUMBER (208) 526-1122
07 OPERATOR (If known) Westinghouse Idaho Nuclear Co.		08 STREET ADDRESS P.O. Box 4000	
09 CITY Idaho Falls	10 STATE Idaho	11 ZIP CODE 83403	12 TELEPHONE NUMBER (208) 526-0998

III. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <u> x </u> YES <u> </u> NO DATE <u> 7 </u> / <u> 10 </u> / <u>86 </u>	
02 SITE STATUS (Check one) <u> </u> A. Active SWMU <u> x </u> B. Inactive <u> </u> C. Unknown	03 YEARS RECEIVED HAZ WASTE None / <u> </u> Start Stop Unknown
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED See Waste Information Section	
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION See Hazardous Conditions and Incidents Section	

IV. INFORMATION AVAILABLE FROM

01 CONTACT Clifford Clark	02 OF (Agency/Org.) DOE-ID	03 TELEPHONE NUMBER (208) 526-1122	
04 PERSON RESPONSIBLE FOR ASSESSMENT D. Joan Poland	05 AGENCY WINCO	06 ORG. N&IS	07 TELEPHONE NUMBER (208) 526-3650
08 DATE <u> 10 </u> / <u> 15 </u> / <u>86 </u> Mon Day Year			

[illegible]

HAZARDOUS CONDITIONS AND INCIDENTS			
I. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)			
01	J. DAMAGE TO FLORA	02	OBSERVED (Date _____) _____ POTENTIAL
04	NARRATIVE DESCRIPTION:		_____ ALLEGED
	Not Applicable		
01	K. DAMAGE TO FAUNA	02	OBSERVED (Date _____) _____ POTENTIAL
04	NARRATIVE DESCRIPTION: (include name(s) of species)		_____ ALLEGED
	Not Applicable		
01	L. CONTAMINATION OF FOOD CHAIN	02	OBSERVED (Date _____) _____ POTENTIAL
04	NARRATIVE DESCRIPTION:		_____ ALLEGED
	Not Applicable		
01	M. UNSTABLE CONTAINMENT OF WASTES	02	OBSERVED (Date _____) _____ POTENTIAL
	(SPILL RUNOFF, STANDING LIQUIDS/LEAKING DRUMS)		
03	NARRATIVE DESCRIPTION:		_____ ALLEGED
	Not Applicable		
01	N. DAMAGE TO OFFSITE PROPERTY	02	OBSERVED (Date _____) _____ POTENTIAL
04	NARRATIVE DESCRIPTION:		_____ ALLEGED
	Not Applicable		
01	O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs	02	OBSERVED (Date _____) _____ POTENTIAL
04	NARRATIVE DESCRIPTION:		_____ ALLEGED
	Not Applicable		
01	P. ILLEGAL/UNAUTHORIZED DUMPING	02	OBSERVED (Date _____) _____ POTENTIAL
04	NARRATIVE DESCRIPTION:		_____ ALLEGED
	Not Applicable		
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL OR ALLEGED HAZARDS			
III. COMMENTS			
Miscellaneous chemicals may have been disposed of here.			
IV. SOURCES OF INFORMATION (List specific references, e.g., state titles, sample analysis, reports)			
Site inspections, personnel interview, disposal quantity records and Installation Assessment Report.			

HAZARDOUS CONDITIONS AND INCIDENTS

1. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONT. 02 ☐ OBSERVED (Date) ☐ POTENTIAL
03 NARRATIVE DESCRIPTION: ☐ ALLEGED
Not Applicable

01 ☐ B. SURFACE WATER CONT. 02 ☐ OBSERVED (Date) ☐ POTENTIAL
03 NARRATIVE DESCRIPTION: ☐ ALLEGED
Not Applicable

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (Date) ☐ POTENTIAL
03 POULATION POTENTIALLY AFFECTED ☐ 04 NARRATIVE DESCRIPTION ☐ ALLEGED
Not Applicable

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (Date) ☐ POTENTIAL
03 POPULATION POTENTIALLY AFFECTED ☐ 04 NARRATIVE DESCRIPTION ☐ ALLEGED
Not Applicable

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (Date) ☐ POTENTIAL
03 POPULATION POTENTIALLY AFFECTED ☐ 04 NARRATIVE DESCRIPTION ☐ ALLEGED
Not Applicable

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (Date) ☒ POTENTIAL
03 NARRATIVE DESCRIPTION: ☐ ALLEGED
The volume of potentially contaminated soil is approximately 10
cubic yards.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (Date) ☐ POTENTIAL
03 NARRATIVE DESCRIPTION: ☐ ALLEGED
Not Applicable

PRIORITY RANKING SYSTEM

I. GENERAL FACILITY INFORMATION

FACILITY NAME: CPP Grease Pit

LOCATION: South of CPP-637

POINT OF CONTACT: NAME: _____

ADDRESS: _____

PHONE: _____

REVIEWER: D. Jean Poland DATE: 10/19/86

II. GENERAL FACILITY DESCRIPTION

GENERAL DESCRIPTION OF THE FACILITY: (For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of facility; contamination route of major concern; types of information needed for rating; agency action, etc.)

Grease pit used for oils and greases
The pit was filled in when the unincorporated
fuel storage building security upgrade
(CPP-651) was completed. The pit is
currently under CPP-651.

III. SCORES

SM = 0 (Sgw= 0 Ssw= 0 Sa= 0)

SFE = 0

SDC = 0

GROUND WATER ROUTE WORKSHEET

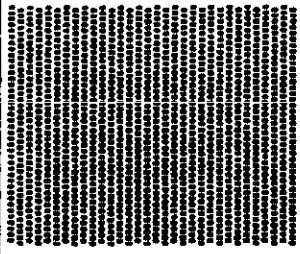
RATING FACTOR	ASSIGNED VALUE (Circle one)	MULTI- PLIER	SCORE	MAX. SCORE	REF. Section
3.2					
1. ROUTE CHARACTERISTICS					
Depth to Aquifer of Concern	0 1 2 3	2		6	
Net Precipitation	0 1 2 3	1		3	
Permeability of the Unsaturated Zone	0 1 2 3	1		3	
Physical State	0 1 2 3	1		3	
Total Route Characteristics Score			5	15	
2. CONTAINMENT					
	0 1 2 3	1	3	3	3.3
3. WASTE CHARACTERISTICS					
Toxicity/Persistence	0 3 6 9 12 15 18	1		18	3.4
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8	
Total Waste Characteristics Score			0	26	
4. Multiply lines 1 x 2 x 3			0	1170	
5. Divide line 4 by 1170 and multiply by 100 Sgw= 0					

SURFACE WATER ROUTE WORKSHEET

RATING FACTOR	ASSIGNED VALUE (Circle one)	MULTI- PLIER	SCORE	MAX. SCORE	REF. Section
4.2					
1. ROUTE CHARACTERISTICS					
Facility Slope and Intervening Terrain	0 1 2 3	1		3	
1-yr. 24-hr. Rainfall	0 1 2 3	1		3	
Distance to Nearest Surface Water	0 1 2 3	2		6	
Physical State	0 1 2 3	1		3	
Total Route Characteristics Score			8	15	
2. CONTAINMENT					
	0 1 2 3	1	0	3	4.3
3. WASTE CHARACTERISTICS					
Toxicity/Persistence	0 3 6 9 12 15 18	1		18	4.4
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8	
Total Waste Characteristics Score			0	26	
4. Multiply lines 1 x 2 x 3			0	1170	
5. Divide line 4 by 1170 and multiply by 100 Ssw= 0					

AIR ROUTE WORKSHEET

RATING FACTOR	ASSIGNED VALUE (Circle one)	MULTI- PLIER	SCORE	MAX. SCORE	REF. Section
1.HISTORIC RELEASE	(0) 45	1	0	45	5.1
Date and Location: See attached supplement pages					
If line 1 is 0, the Sa = 0. Enter on line 5.					
If line 1 is 45, then proceed to line 2.					
2.WASTE CHARACTERISTICS					5.2
Reactivity and Incompatibility	0 1 2 3	1		3	
Toxicity	0 1 2 3	3		9	
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8	
Total Waste Characteristics Score				20	
3.TARGETS					5.3
Population within 4-mile Radius	0 9 12 15 18 21 24 27 30	1		30	
Distance to Sensitive Environment	0 1 2 3	2		6	
Land Use	0 1 2 3	1		3	
Total Target Scores				39	
4. Multiply lines 1 x 2 x 3				35100	
5. Divide line 4 by 35100 and multiply by 100 Sa = 0					

	S	S ²
GROUNDWATER ROUTE SCORE (S _{gw})	0	0
SURFACE WATER ROUTE SCORE (S _{sw})	0	0
AIR ROUTE SCORE (S _a)	0	0
$S_{gw}^2 + S_{sw}^2 + S_a^2$		0
$SQR(S_{gw}^2 + S_{sw}^2 + S_a^2)$		0
$SQR(S_{gw}^2 + S_{sw}^2 + S_a^2) / 1.73 = SM$		0

DOCUMENTATION RECORDS
FOR
HAZARD RANKING SYSTEM

INSTRUCTIONS: As briefly as possible, summarize the information you used to assign the score for each factor (e.g., "Waste quantity = 4,230 drums plus 800 cubic yards of sludges"). The source of information should be provided for each entry and should be a bibliographic-type reference. Include the location of the document.

FACILITY NAME: CPP Grease Pit

LOCATION: South of CPP 637

DATE SCORED: 10/20/86

PERSON SCORING: D. Jean Poland

PRIMARY SOURCE(S) OF INFORMATION:

Site inspections and personnel interviews

FACTORS NOT SCORED DUE TO INSUFFICIENT INFORMATION:

COMMENTS OR QUALIFICATIONS:

GROUNDWATER ROUTE

1. OBSERVED RELEASE - Undertake Corrective Action

Contaminants detected (3 maximum):

None

Rationale for attributing the contaminants to the facility:

2. ROUTE CHARACTERISTICS

Depth to Aquifer of Concern

Name/description of aquifer(s) of concern:

Snake River Plain Aquifer

Depth(s) from the ground surface to the highest seasonal level of the saturated zone [water table(s)] of the aquifer of concern:

450 ft.

Depth from the ground surface to the lowest point of waste disposal/storage:

8-10 ft.

Net Precipitation

Mean annual or seasonal precipitation (list months for seasonal):

9.07 inches

Mean annual lake or seasonal evaporation (list months for seasonal):

36 inches

Net precipitation (subtract the above figures):

- 26.93 inches

Permeability of Unsaturated Zone

Soil type in unsaturated zone:

An interbedded sequence of basaltic lava flows and sedimentary deposits.

Permeability associated with soil type:

10^{-7} to 10^{-3} cm/sec

Physical State

Physical state of substances at time of disposal (or at present time for generated gases):

Liquid - Sludge

3. CONTAINMENT

Containment

Method(s) of waste or leachate containment evaluated:

None

Method of highest score:

4. WASTE CHARACTERISTICS

Toxicity and Persistence

Compound(s) evaluated:

None

Compound with highest score:

None

Hazardous Waste Quantity

Total quantity of hazardous substances at the facility, excluding those with a containment score of 0 (Give a reasonable estimate even if quantity is above maximum):

None - just oils and greases

Basis of estimating and/or computing waste quantity:

Checklist for Groundwater Releases

	<u>Yes</u>	<u>No</u>
<u>Identifying Release</u>		
1. <u>Potential for Groundwater Releases from the Unit</u>		
o Unit type and design		
- Does the unit type (e.g., land-based) indicate the potential for release?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
- Does the unit have engineered structures (e.g., liners, leachate collection systems, proper construction materials) designed to prevent releases to groundwater?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o Unit operation		
- Does the unit's age (e.g., old unit) or operating status (e.g., inactive, active) indicate the potential for release?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Does the unit have poor operating procedures that increase the potential for release?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Does the unit have compliance problems that indicate the potential for a release to groundwater?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o Physical condition		
- Does the unit's physical condition indicate the potential for release (e.g., lack of structural integrity, deteriorating liners, etc.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o Locational characteristics		
- Is the unit located on permeable soil so the release could migrate through the unsaturated soil zone?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
- Is the unit located in an arid area where the soil is less saturated and therefore a release has less potential for downward migration?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
- Does the depth from the unit to the uppermost aquifer indicate the potential for release?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Checklist for Groundwater Releases

	<u>Yes</u>	<u>No</u>
- Does the rate of groundwater flow greatly inhibit the migration of a release from the facility?	<u>✓</u>	<u> </u>
- Is the facility located in an area that recharges surface water?	<u> </u>	<u>✓</u>
o Waste characteristics		
- Does the waste in the unit exhibit high or moderate characteristics of mobility (e.g., tendency not to sorb soil particles or organic matter in the unsaturated zone)?	<u> </u>	<u>✓</u>
- Does the waste exhibit high or moderate levels of toxicity?	<u> </u>	<u>✓</u>
2. <u>Evidence of Groundwater Releases</u>		
o Existing groundwater monitoring systems		
- Is there an existing system?	<u> </u>	<u>✓</u>
- Is the system adequate?	<u> </u>	<u>✓</u>
- Are there recent analytical data that indicate a release?	<u> </u>	<u>✓</u>
o Other evidence of groundwater releases		
- Is there evidence of contamination around the unit (e.g., discolored soils, lack of or stressed vegetation) that indicates the potential for a release to groundwater?	<u> </u>	<u>✓</u>
- Does local well water or spring water sampling data indicate a release from the unit?	<u> </u>	<u>✓</u>

Determining the Relative Effect of the Release on Human Health and the Environment

1. Exposure Potential

o Conditions that indicate potential exposure		
- Are there drinking water well(s) located near the unit?	<u> </u>	<u>✓</u>
- Does the direction of groundwater flow indicate the potential for hazardous constituents to migrate to drinking water wells?	<u> </u>	<u>✓</u>

SURFACE WATER ROUTE

1. OBSERVED RELEASE - Undertake Corrective Action

Contaminants detected in surface water at the facility or downhill from it (3 maximum):

None

Rationale for attributing the contaminants to the facility:

2. ROUTE CHARACTERISTICS

Facility Slope and Intervening Terrain

Average slope of facility in percent:

0.04%

Name/description of nearest downslope surface water:

Big Lost River

Average slope of terrain between facility and above cited surface water body in percent:

0.07%

Is the facility located either totally or partially in surface water?

No

Is the facility completely surrounded by areas of high elevation?

No

1-year 24-Hour Rainfall in Inches

less than 2 inches

Distance to Nearest Downslope Surface Water

1,750

Physical State of Waste

Contaminated Soil

3. CONTAINMENT

Containment

Method(s) of waste or leachate containment evaluated:

None

Method with highest score:

Checklist for Surface Water/Surface Drainage Releases

Yes

No

Identifying Releases

1. Potential for Surface Water/Surface Drainage Release from the Facility

o Proximity to Surface Water and/or to Off-site Receptors

- Could surface run-off from the unit reach the nearest downgradient surface water body? _____

✓

- Could surface run-off from the unit reach off-site receptors (e.g., if facility is located adjacent to populated areas and no barrier exists to prevent overland surface run-off migration)? _____

✓

o Release Migration Potential

- Does the slope of the facility and intervening terrain indicate potential for release? _____

✓

- Is the intervening terrain characterized by soils and vegetation that allow overland migration (e.g., clayey soils, and sparse vegetation)? _____

✓

- Does data on one-year 24-hour rainfall indicate the potential for area storms to cause surface water or surface drainage contamination as a result of run-off? _____

✓

o Unit Design and Physical Condition

- Are engineered features (e.g., run-off control systems) designed to prevent release from the unit? _____

✓

- Does the operational history of the unit indicate that a release has taken place (e.g., old, closed or inactive unit, not inspected regularly, improperly maintained)? _____

✓

- Does the physical condition of the unit indicate that releases may have occurred (e.g., cracks or stress fractures in tanks or erosion of earthen dikes of surface impoundments)? _____

✓

Checklist for Surface Water/Surface Drainage Releases

	<u>Yes</u>	<u>No</u>
o Waste Characteristics		
- Is the volume of discharge high relative to the size and flow rate of the surface water body?	—	✓
- Do constituents in the discharge tend to sorb to sediments (e.g., metals)?	—	✓
- Do constituents in the discharge tend to be transported downstream?	—	✓
- Do waste constituents exhibit moderate or high characteristics of persistence (e.g., PCBs, dioxins, etc.)?	—	✓
- Do waste constituents exhibit moderate or high characteristics of toxicity (e.g., metals, chlorinated pesticides, etc.)?	—	✓
2. Evidence of Surface Water/Surface Drainage Releases		
o Are there unpermitted discharges from the facility to surface water that require an NPDES or a Section 404 permit?	—	✓
o Is there visible evidence of uncontrolled run-off from units at the facility?	—	✓
<u>Determining the Relative Effect of the Release on Human Health and the Environment</u>		
1. o Are there drinking water intakes nearby?	—	✓
o Could human and/or environmental receptors come into contact with surface drainage from the facility?	—	✓
o Are there irrigation water intakes nearby?	—	✓
o Could a sensitive environment (e.g., critical habitat, wetlands) be affected by the discharge (if it is nearby)?	—	✓

AIR ROUTE

1. OBSERVED RELEASE

Contaminants detected:

None

Date and Location of detection of contaminants:

Methods used to detect the contaminants:

Rationale for attributing the contaminants to the site:

2. WASTE CHARACTERISTICS

Reactivity and Incompatibility

Most reactive compound:

None

Most incompatible pair of compounds:

None

Toxicity

Most toxic compound:

None

Hazardous Waste Quantity

Total quantity of hazardous waste:

None

Basis of estimating and/or computing waste quantity:

Checklist for Air Releases

Yes

No

Identifying Releases

1. Potential for Air Releases from the Facility

o Unit Characteristics

- Is the unit operating and does it expose waste to the atmosphere? ✓

- Does the size of the unit (e.g., depth and surface area) create a potential for air release? ✓

o Does the unit contain waste that exhibits a moderate or high potential for vapor phase release?

- Does the unit contain hazardous constituents of concern as vapor releases? ✓

- Do waste constituents have a high potential for volatilization (e.g., physical form, concentrations, and constituent-specific physical and chemical parameters that contribute to volatilization)? ✓

o Does the unit contain waste and exhibit site conditions that suggest a moderate or high potential for particulate release?

- Does the unit contain hazardous constituents of concern as particulate releases? ✓

- Do constituents of concern as particulate releases (e.g., smaller, inhalable particulates) have potential for release via wind erosion, reentrainment by moving vehicles, or operational activities? ✓

- Are particulate releases comprised of small particles that tend to travel off-site? ✓

o Do certain environmental and geographic factors affect the concentrations of airborne contaminants?

- Do atmospheric/geographic conditions limit constituent dispersion (e.g., areas with atmospheric conditions that result in inversions)? ✓

- Is the facility located in a hot, dry area? ✓

Checklist for Air Releases

	<u>Yes</u>	<u>No</u>
2. Evidence of Air Releases		
o Does on-site monitoring data show that releases have occurred or are occurring (e.g., OSHA data)?	___	___ ✓
o Have particulate emissions been observed at the site?	___	___ ✓
o Have there been citizen complaints concerning odors or observed particulate emissions from the site?	___	___ ✓

Determining the Relative Effect of the Release on Human Health and the Environment

1. Exposure Potential

o Is a populated area located near the site?	___	___ ✓
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Checklist for Subsurface Gas Releases

Yes

No

Identifying a Release

1. Potential for Subsurface Gas Releases

- ☐ Does the unit contain waste that generates methane or generates volatile constituents that may be carried by methane (e.g., decomposable refuse/volatile organic wastes)?
- ☐ Is the unit an active or closed landfill or a unit closed as a landfill (e.g., surface impoundments and waste piles)?

—

✓

—

✓

2. Migration of Subsurface Gas to On-site or Off-site Buildings

- ☐ Are on-site or off-site buildings close to the unit?
- ☐ Do natural or engineered barriers prevent gas migration from the unit to on-site or off-site buildings (e.g., low soil permeability and porosity hydrogeologic barriers/liners, slurry walls, gas control systems)?
- ☐ Do natural site characteristics or man-made structures (e.g., underground power transmission lines, sewer pipes/sand and gravel lenses) facilitate gas migration from the unit to buildings?

✓

—

—

✓

—

✓

Determining the Relative Effect of the Release on Human Health and the Environment

1. Exposure Potential

- ☐ Does building usage (e.g., residential, commercial) exhibit high potential for exposure?

—

✓

FIRE AND EXPLOSION

1. CONTAINMENT

Hazardous substances present:

None

Type of containment, if applicable:

2. WASTE CHARACTERISTICS

Direct Evidence

Type of instrument and measurements:

None

Ignitability

Compound used:

None

Reactivity

Most reactive compound:

None

Incompatibility

Most incompatible pair of compounds:

None

Hazardous Waste Quantity

Total quantity of hazardous substances at the facility:

None

Basis of estimating and/or computing waste quantity:

3. TARGETS

Distance to Nearest Population

50 ft.

Distance to Nearest Building

0 ft.

Distance to Sensitive Environment

Distance to wetlands:

Greater than 100 feet

Distance to critical habitat:

Greater than 1/2 mile

Land Use

Distance to commercial/industrial area, if 1 mile or less:

The INEL is a research facility. There are no commercial/industrial facilities within 1 mile.

Distance to national or state park, forest, or wildlife reserve, if 2 miles or less:

Greater than 2 miles

Distance to residential area, if 2 miles or less:

Greater than 2 miles

Distance to agricultural land in production within past 3 years, if 1 mile or less:

Greater than 1 mile

Distance to prime agricultural land in production within past 3 years,
if 2 miles or less:

Greater than 2 miles

If a historic or landmark site (National Register or Historic Places
and National Natural Landmarks) within the view of the site?

Big Southern Butte

Population Within 2-Mile Radius

1828

Buildings Within 2-Mile Radius

189

DIRECT CONTACT

1. OBSERVED INCIDENT

Date, location, and pertinent details of incident:

None

2. ACCESSIBILITY

Describe type of barrier(s):

Buried

3. CONTAINMENT

Type of containment, if applicable:

None

4. WASTE CHARACTERISTICS

Toxicity

Compounds evaluated:

None

Compound with highest score:

5. TARGETS

Population within one-mile radius

1367

Distance to critical habitat (of endangered species)

Greater than 1 mile

EXHIBIT 3

J.C. 16

RECEIVED
MAY 7 1987
T. P. POINTER

AJM-25-87

April 28, 1987

RECEIVED

JAN 04 1991

F. H. Weiler
Fuel Processing and Waste Operations Division... **FILE COPY**
Idaho Operations Office, USDOE
785 DOE Place
Idaho Falls, ID 83402

Dear Mr. Weiler:

Subject: ICPP Summary Assessments.

Attached for your review are the Summary Assessments for the following ICPP units.

CPP-41 - Fire Training Pits
CPP-43 - Grease Pit
CPP-52 - Pickling Shed
CPP-70 - Septic Tank
CPP-71 - Seepage Pits
CPP-72 - Cesspool
CPP-73 - Leaching Cesspool
CPP-74 - Seepage Pit
CPP-75 - Septic Tank
CPP-76 - Septic Tank
CPP-77 - Seepage Pit and Cesspool

If you have any questions, please contact D. Joan Poland at 6-3650.

A. G. Matule
A. G. Matule, Manager
Environmental Engineering

DJP/tlr

Attachment

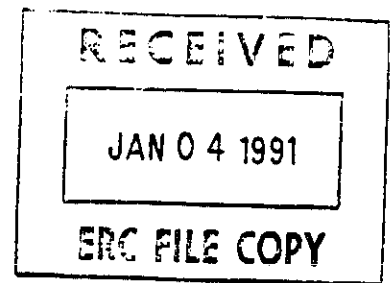
cc: J. H. Barry, DOE-ID w/o enclosure
C. E. Clark, DOE-ID
M. W. Littleton, DOE-ID w/o enclosure
J. L. Lyle, DOE-ID



Westinghouse Idaho Nuclear Company, Inc.

Box 4000 Idaho Falls, ID 83403

000856



10K034
JAN 0 4 1991

001024

ICPP SUMMARY ASSESSMENTS

APRIL 1987

Summary Assessment of CPP-43

001024

Unit Name:

CPP-43, Grease Pit.

Unit Description:

CPP-43, grease pit, was located south of CPP-637, at the present location of CPP-651. The grease pit was used for the disposal of an unknown quantity of oil and grease. The grease pit was filled in when the unirradiated fuel storage building upgrade (CPP-651) was completed in 1975.

Initial Assessment:

The grease pit ranked zero on the EPA Priority Ranking System.

Motor vehicle oils and grease were the only known materials disposed of in the grease pit. Neither of these materials are listed as hazardous materials. Also, meaningful sampling cannot be conducted due to the construction of CPP-651 over the unit.

Summary Assessment:

The grease pit should be removed from the list of potentially hazardous units. Based on the information gathered, the materials disposed in the grease pit were not hazardous and meaningful sampling cannot be conducted due to the construction of CPP-651 over the unit. It is recommended that the unit be administratively closed and that no further investigations be conducted.

Methods of Assessment:

The methods used in this assessment include:

- o Reviews of engineering drawings
- o Review of the ICPP Facility Master Plan
- o Interviews with ICPP personnel.

EXHIBIT 4



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101
JAN 05 1968

up to [unclear]
me
orig to Hunter

REPLY TO
ATTN OF HW-112

RECEIVED

Thomas F. Gesell
Deputy Assistant Manager for
Nuclear Programs
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

83 JAN -8 PM 11

RECEIVED

JAN 08 1968

ASSISTANT MANAGER
FOR NUCLEAR PROGRAMS

Re: Review of Selected Summary Assessments

Dear Mr. Gesell:

We have reviewed the summary assessments for the following solid waste management units:

- | | | |
|--------------|--|-------------------------------|
| (1) CPP-41 | Fire Training Pits (Rev. 3) | <i>CPP only reviewed once</i> |
| (2) CPP-43 | Grease Pit (Rev. 3) | |
| (3) CPP-52 | Pickling Shed E. of CPP-631 (Rev. 3) | |
| (4) CPP-70 | Septic Tank E. of CPP-655 (Rev. 3) | |
| (5) CPP-71 | Seepage Pits W. of CPP-656 (Rev. 3) | |
| (6) CPP-72 | CPP-758 Cesspool E. of CPP-651 (Rev. 3) | |
| (7) CPP-73 | Leaching Cesspool E. of CPP-T-5 (Rev. 3) | |
| (8) CPP-74 | Seepage Pit W. of CPP-626 (Rev. 3) | |
| (9) CPP-75 | Septic Tank W. of CPP-603 (Rev. 3) | |
| (10) LOFT-04 | LOFT Injection Well (Rev. 2) | |
| (11) PBF-01 | PBF Control Area Septic Tank & Seepage Pit (Rev. 2) | |
| (12) PBF-03 | PBF Control Area Septic Tank & Seepage Pits (Rev. 2) | |
| (13) TRA-08 | TRA Cold Waste Disposal Pond (Rev. 2) | |
| (14) TRA-10 | MTR Construction Excavation Pile (Rev. 2) | |
| (15) TRA-23 | ETR Excavation Site Rubble Pile (Rev. 2) | |
| (16) TRA-24 | TRA Guardhouse Constr. Rubble Pile (Rev. 2) | |
| (17) TRA-25 | TRA Sewer Plant Settling & Pond Rubble Pile (Rev. 2) | |
| (18) TRA-26 | TRA Rubble Site by USGS Observation Well (Rev. 2) | |
| (19) TRA-28 | TRA North Rubble Site (Rev. 2) | |
| (20) TRA-29 | TRA ATR Constr. Rubble (Rev. 2) | |

Each of the 20 summary assessments listed above provide a good review of the available background data in support of each proposal to delete a Solid Waste Management Unit (SWMU) from the priority listing. Before discussing our particular comments on each assessment it may be valuable to discuss our views on the topic of summary assessments and the basis for dropping SWMU's off of the priority listing. Our first level of review is to evaluate the probability that wastes containing hazardous constituents have been disposed of in the unit. Unfortunately, many of the summary assessments discuss hazardous waste disposal or release. The criteria is hazardous constituents not hazardous waste. Hazardous constituents are those chemicals listed on Appendix VIII of 40 CFR Part 261. This listing of several hundred compounds

can be found as ingredients in a wide variety of materials. Second, attention must be paid to the probable quantity of hazardous constituents which were disposed. Third, the likelihood that hazardous constituents present in the unit can migrate from the unit; and fourth, if we can assume a release from the unit, is the release likely to migrate to surface water, ground water or air. The first level of review is straightforward. More information is required to support unit deletion at the second level. Chemical inventory records, interviews, process descriptions and other indirect data collection efforts may be required to develop a convincing position. At the third level of review, documentation is needed establishing that the hazardous constituents in the unit are contained. It is probable that such a demonstration will require some level of sampling activity. Proving the case that hazardous constituent migration is bound in the soil and not releasable to ground water is extremely difficult without a good characterization of the underlying unsaturated and saturated earthen materials.

Our specific comments are as follows:

CPP-41, Fire Training Pits - The dangers of the use of hazardous waste as fuel for fire training exercises is only now becoming apparent. The old adage that volatile organics evaporate away diminishes with each discovery of ground water contamination. Pouring volatile organics on the ground with subsequent addition of copious amounts of fire fighting water results in soil and ground water contamination. Therefore, we do not agree with the recommendation of this summary assessment. Sampling of the underlying subsoils for the presence of hazardous constituents will be necessary to support deletion of this unit from the list.

CPP-43, Grease Pit - This unit is reported to have been filled in and covered by a building in the mid-1970's. Previously it had been used for the disposal of an unknown quantity of oil and grease. Although hazardous constituents are likely present in the unit, ground water is located hundreds of feet below and the unit is covered by a building. In the Chemical Processing Plant area, the Snake River Plain Aquifer is reported to be highly prolific and would make monitoring difficult. Although the case made is persuasive, some additional information is necessary. First, a description of how the unit is located under the building needs expanding. Second, the years of operation of the unit are not provided. Third, what are the likely solvents used during the years of operation should be explored (e.g., were carburetor solvents used). Fourth, the size of the operation which would have expected to use the pits should be evaluated which can provide an estimate of quantities of oils and grease which may have been disposed.

CPP-52, Pickling Shed E. of CPP-631 - Was a temporary structure which was demolished in approximately 1954. Based on interviews, the materials which would have been stored at the shed were mineral acids. The location of the shed is poorly known and it is reported that the area has been extensively reworked which would make sampling difficult. As over 30 years have passed and the hazardous waste was limited to mineral acids in addition to the soil being naturally basic, it is unlikely that further investigation would be

fruitfull. Therefore, we would agree that this unit can be deleted from the list.

CPP-70, Septic Tank E. of CPP-655 - is used to treat sanitary waste generated at the Craft Shop and Warehouse Building. Operations reported at the building include equipment maintenance and repair, welding and carpentry. It is reported that there are no drains in the work areas and therefore, it is unlikely that hazardous constituents were disposed into the septic system. As part of our quality audit of summary assessments, we would like to review engineering drawing #057140 as it is used to support the claim that no drains are located in the work areas. If our review of the drawing confirms the findings in the summary assessment, we will agree to delete this unit from the list.

CPP-71, Seepage Pits W. of CPP-656 - Is used in conjunction with CPP-70 and our comments for CPP-70 apply.

CPP-72, CPP-758 Cesspool E. of CPP-651 - This septic system was used to treat sanitary sewage from temporary office trailers TR-1 through TR-9. The trailers have subsequently been disconnected from the system which is no longer in use. As this septic system was only connected to office bathrooms, it is improbable that hazardous constituents were disposed of into the system and we therefore, agree with the deletion of this unit from the list.

CPP-73, Leaching Cesspool E. of CPP-T-5 - It is reported that this septic system is connected to temporary building CPP-T-5 which is used as a lunch/break room by a construction contractor. No hazardous materials are reported to have been used or stored at this location and we therefore, concur with the assessment that this unit should be deleted from the list.

CPP-74, Seepage Pit W. of CPP-626 - It is reported that this septic system built around 1971, is used to treat sanitary waste from both the Fuel Receiving and Storage Building and the Storage Basin Change Room. The building is reported to contain a cafeteria, bathroom facilities, showers, and office space. No operations involving hazardous materials are known to have been employed in the building. We therefore concur with the assessment that this unit should be deleted from the list.

CPP-75, Septic Tank W. of CPP-603 - This septic system is reported to have received sanitary wastes prior to the operation of CPP-74 and was built around 1953. Interviews with employees identified that the septic system was only connected to a sink and comode which were physically isolated from from hazardous material operations. It was also reported that the primary hazardous material used was mineral acid. As it is unlikely that additional information will be found on this unit and there is no information supporting the disposal of hazardous constituents into the unit, we agree that this unit should be deleted from the list.

CPP-76, Septic Tank W. of CPP-659 - This unit was reported to have received sanitary waster from the old Waste Calcining Facility which was built in 1960. It is reported that the septic system was removed in approximately

1976. Little information is provided on what fixtures would have been connected to the unit and the types of processes which would be located nearby. Also, it would appear an easy matter to provide documentation that the unit was removed. We request that this additional information be provided in a revised summary assessment. We also request that engineering drawings numbered 055182 and 055335 be appended onto the revised assessment which we will review as part of our quality audit.

LOFT-04, LOFT Injection Well - Is a 300 ft. deep injection well designed for the disposal of noncontaminated or cold waste water from LOFT operations. It is currently used as a USGS monitoring well. As there is no unit remaining for hazardous constituents to migrate from, this unit can be deleted from the list. Any plume of contamination detected in the aquifer as part of corrective action or unit investigation activities would be evaluated separately.

PBF-01, PBF Control Area Septic Tank & Seepage Pit - This septic system is used to treat sanitary waste discharges from the electrical maintenance shop. Summaries of interviews reported in the assessment support that the maintenance activities in the shop which used solvent did not result in free liquid which could be discharged into the septic system. Although the assessment erroneously addresses hazardous waste rather than hazardous constituent discharges, the information provided in the assessment report supports the conclusion that this unit should be deleted from the list.

PBF-03, PBF Control Area Septic Tank & Seepage Pits - This septic system receives waste from Control Building PBF-632. It is reported that the engineering drawings show that the system is only connected to non-industrial common areas and interview summaries support this finding. However, as part of our quality audit program, we request that all supporting documentation be provided on this unit for our review. If our review agrees with your findings we will support the deletion of this unit from the list.

TRA-08, TRA Cold Waste Disposal Pond - This unlined unit, constructed in 1982, has a capacity of over one million gallons and handles flows up to 800 gallons per minute. It is reported that sampling and analysis of pond influent for heavy metals show an annual mean concentration which is very low, but this conclusion is highly subjective. As the operation of this pond promotes liquid migration to ground water, we require that all sampling results be appended to the assessment to allow an evaluation of the potential of the unit to release hazardous constituents into the environment.

TRA-10, MTR Construction Excavation Pile - This construction pile is reported as containing only concrete and excavated soil. Interview summaries with employees familiar with the operation are included to support this finding. The only observed components of the pile is reported to be concrete and soil and the pile is periodically used to provide backfill in other construction projects. Although the information provided supports deletion of this unit, we are reluctant to agree at this time. Instead, we will add this unit to our inspection inventory for the spring site visit. Based on our observations at that time we will then revisit the issue of list deletion.

3

TRA-23, ETR Excavation Site Rubble Pile - This excavation pile is associated with the construction of the ETR Building and the assessment is very similar to that provided for TRA-10. Therefore, our response is the same as for TRA-10 and we will inspect this unit at our next site visit.

TRA-24, TRA Guardhouse Construction Rubble Pile - This site consists of construction rubble from the building of the TRA Guardhouse. Photographs are included in the assessment which support the finding that no hazardous constituents are present. Based on the source of the material and as this pile is outside the fence and the area is a security area where unauthorized visitors would be stopped and questioned, we agree with the proposed deletion of this unit from the list.

TRA-25, TRA Sewer Plant Settling & Pond Rubble Pile - This site consists of construction rubble from the building of the TRA Sewer Plant Settling Ponds. Photographs are included in the assessment which support the finding that no hazardous constituents are present. Based on the source of the material and as this pile is outside the fence and the area is a security area where unauthorized visitors would be stopped and questioned, we agree with the proposed deletion of this unit from the list.

TRA-26, TRA Rubble Site by USGS Observation Well - Contains construction debris of unknown origin. Photographs are included in the assessment which support the finding that no hazardous constituents are present. However, as the source of the material is unknown, we are reluctant to agree at this time to delete the unit from the list. Instead, we will add this unit to our inspection inventory for the spring site visit. Based on our observations at that time we will then revisit the issue of list deletion.

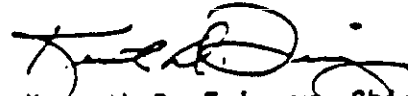
TRA-28, TRA North Rubble Site - Contains construction debris of unknown origin. Photographs are included in the assessment of three test excavations which support the finding that no hazardous constituents are present. Although the source of the material is unknown, the three test trenches provide adequate support to justify deletion of this the unit from the list.

TRA-29, TRA ATR Construction Rubble - Contains construction debris of unknown origin. Photographs are included in the assessment of four test excavations which support the finding that no hazardous constituents are present. Although the source of the material is unknown, the four test trenches provide adequate support to justify deletion of this the unit from the list.

In summary, eleven of the summary assessments provided are sufficient to support unit deletion from the universe. In accordance with Paragraph D.1(a) of Appendix I to the Consent Order and Compliance Agreement, we concur with the findings of the following summary assessments: CPP-52; CPP-72; CPP-73; CPP-74; CPP-75; LOFT-04; PBF-01; TRA-24; TRA-25; TRA-28; and TRA-29. In accordance with Paragraph D.1(b) we have identified additional information needs for the remainder of the summary assessments identified above.

Please contact Wayne Pierre of my staff at FTS 399-7261 if you would like to discuss this matter further.

Sincerely,



Kenneth D. Feigner, Chief
Waste Management Branch

cc: Cheryl Koshuta, Idaho Department of Health and Welfare
Greg Weatherby, Idaho Department of Health and Welfare

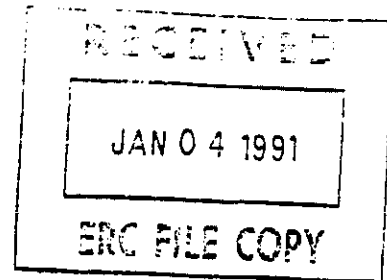
EXHIBIT 5



Idaho National Engineering Laboratory

AJM-18-88

March 31, 1988



001025

F. H. Weiler, Physical Scientist
Office of Assistant Manager for Nuclear Programs
Environmental Support Office
Idaho Operations Office, USDOE
785 DOE Place
Idaho Falls, ID 83402

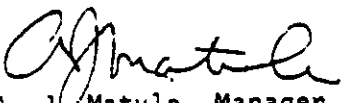
Dear Mr. Weiler:

Subject: Revised Summary Assessments.

Attached for your review and/or submittal to the EPA are the 2nd revisions of the following Summary Assessments:

CPP-41	Fire Training Pits
CPP-43	Grease Pit south of CPP-637
CPP-70	Septic Tank east of CPP-655
CPP-71	Seepage Pits west of CPP-656
CPP-76	Septic Tank west of CPP-659
CPP-77	Seepage Pit and Cesspool north of CPP-662

If you have any questions, please contact D. Joan Poland at 6-3650.


A. J. Matule, Manager
Environmental Engineering

GS/tlr

Attachment

cc: W. K. Anawalt, DOE-ID
J. H. Barry, DOE-ID w/o attachment
T. F. Gesell, DOE-ID w/o attachment



Westinghouse Idaho Nuclear Company, Inc.

Box 4000 Idaho Falls, ID 83403

The Summary Assessments in this document replace Summary Assessments CPP-41, -43, -70, -71, -76, and -77 which were submitted to the United States Environmental Protection Agency Region X (EPA, Region X) on August 26, 1987. EPA Region X's review comments have been incorporated to ensure compliance with the Consent Order and Compliance Agreement (CO&CA) for the INEL.

REVISED SUMMARY ASSESSMENTS
FOR SOLID WASTE MANAGEMENT UNITS
CPP-41, -43, -70, -71, -76, AND -77

001025

Prepared by:

Geoff Schlee 30 March 1988

Reviewed by:

Amatale 3-31-88
N&IS Dept. Date

D. Cassin Pineda 3/31/88
N&IS Dept. Date

W.B. Palmer 3-31-88
Engineering/Projects Dept. Date

J.C. Midgett 3/31/88
Production Dept. Date

P.L. Trebek 3/31/88
Technical Dept. Date

Revised Summary Assessment of CPP-43

001025

Unit Name:

CPP-43, Grease Pit.

Unit Description:

CPP-43, grease pit, is located south of the Process Improvement Facility (CPP-637), at the present location of the Unirradiated Fuels Storage facility (CPP-651)¹. CPP-651 is a 1,500 ft² vault-like steel reinforced concrete structure. The grease pit was used for the disposal of an unknown quantity of oil and grease¹. The grease pit was filled in and covered by CPP-651 when the facility upgrade was completed in 1975².

Initial Assessment:

The grease pit ranked zero on the EPA Priority Ranking System³.

Motor vehicle oils and grease were the only known materials disposed of in the grease pit. Neither of these materials are listed as hazardous constituents in 40 CFR 261. Due to the presence of the Unirradiated Fuels Storage Facility over the unit meaningful sampling cannot be conducted.

Summary Assessment:

The grease pit should be removed from the list of potentially hazardous units. Although oils and greases may contain hazardous materials (e.g. heavy metals and PCB's), it was concluded that the probability of hazardous materials migrating from the unit is negligible because the unit is covered by the Unirradiated Fuels Storage Facility². The building acts as a barrier against volatiles being released to the atmosphere and against precipitation carrying hazardous materials to the groundwater below the ICPP. Also, meaningful sampling cannot be conducted because of the presence of the Unirradiated Fuels Storage Facility over the unit.

Information concerning the operation of the unit is not available because the grease pit was used in the "early" operation of the ICPP when records of these operations were not maintained. The dates of use and the size of the operation that generated waste could not be determined, but interviews indicated that grease and oil were the materials discarded in the pit⁴. The quantities of materials discarded could not be determined, but it is estimated that approximately 10 yd³ of soil was contaminated¹.

Since there is little probability of materials migrating from the unit and meaningful samples cannot be collected, it is recommended that the unit be administratively closed and that no further investigations be conducted.

Methods of Assessment:

The methods used in this assessment include:

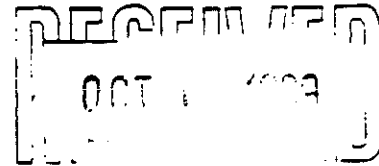
1. Reviews of the Installation Assessment Report, Idaho Chemical Processing Plant, May 1986 (p. 58 and Table 5.2).
2. Reviews of the ICPP Facility Master Plan (IPM XVII, p. 11).
3. Reviews of the Initial Assessment Report, Idaho Chemical Processing Plant, Vol. IV, November 1986.
4. Interviews with ICPP personnel: Interviews were conducted with the individuals responsible for preparing the Installation Assessment Report, Idaho Chemical Processing Plant, May 1986.

D. J. Poland (WINCO Environmental Engineering; phone number 526-3650) and R. L. Nebeker (WINCO Technical Department; phone number 526-3578) established the location of the grease pit during interviews and reviews of old ICPP maps. The grease pit was located under the northwest corner of building CPP-651. Poland and Nebeker were unable to determine the dates of use or the size of the operation that generated waste, but interviews indicated that grease and oil were the only materials discarded in the pit.

EXHIBIT 6



OCT 16 1989



Reply Attention of: HW-112

Mr. Hunter Weiler
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

RE: Summary Assessment Reviews

Dear Mr. Weiler:

We have reviewed the summary assessments for the following Solid Waste Management Units:

Rockwell	SMC Septic Tank and Drain Field
NRF	SWMU #4 Top Soil Pit Area
IET-07	Hot Waste Tank
ARA-07	ARA-II Seepage Pit
ARA-09	ARA-II Septic Tank
ARA-10	ARA-II Septic Tank East
ARA-11	ARA-II Septic Tank West
PBF-03	PBF Control Area Septic Tank for PBF-632 and Seepage Pits
EOCR-04	Septic Tank
CPP-41	Fire Training Pits
CPP-43	Grease Pit
CPP-70	Septic Tank East of CPP-655
CPP-71	Seepage Pits West of CPP-656
CPP-76	Septic Tank West of CPP-659
CPP-77	Seepage Pit and Cesspool North of CPP-662

The Summary Assessments for Rockwell SMC Septic Tank and Drain Field, NRF SWMU #4, ARA-7, ARA-9, ARA-10, PBF-03, and EOCR-04 are sufficient to support the deletion of these seven (7) units from the RCRA universe. In accordance with Paragraph D.1(a) of Appendix I to the Consent Order and Compliance Agreement ("Agreement"), we concur with the findings of the above identified summary assessments.

EPA intends to quality assure the accuracy of the summary assessments by periodically reviewing the support information referenced. Although we are concurring with the conclusions reached for selected summary assessments, it must be noted this decision is based on the assumption the information is correct. For quality assurance purposes we request all supporting information (i.e., notes, interview logs, drawings, etc.) for the

summary assessments for: ARA-7, ARA-9, ARA-10, and PBF-03 be submitted for our review. If any summary assessment is found to be deficient, we will require each summary assessment to include all supporting information.

In accordance with Paragraph D1(b) of the Agreement we have identified additional information needs for the other units reviewed.

IET-07 Hot Waste Tank: This assessment references the closure plan of October 1986 for the IET Container Storage Unit. This closure plan was never approved, (see EPA letter to Cliff Clark from 10/27/87 of which a copy is enclosed). A copy of the closure certificate (from the unapproved closure plan) has not been received.

ARA-7, ARA-9, and ARA-10: These units which are all connected, have been approved for deletion from the list. The summary assessments did not address the possibility of radioactive contamination. Radioactive contamination does not fall under RCRA regulation, but if these units are found to be radioactively contaminated they would be subject to regulation under CERCLA or AEA.

ARA-11: The history of this unit indicates the building may have also been used as a light laboratory. More information is needed to determine if this unit should be deleted from the list.

CPP-41: This unit is proposed for administrative closure due to construction over the former pit area. More detail is needed on the location of the unit under the building and the location and construction of the building.

CPP-43: This unit is also proposed for administrative closure due to construction over the unit. EPA commented on this summary assessment in a letter dated January 5, 1988. The comments were not addressed in the revisions of the summary assessments. The description of how the unit is located under the building needs to be expanded. The years of operation of the unit are not provided. Identify the solvents likely to have been used during the years of operation. Provide the size of the operation which would have impacted the pit.

CPP-70: This summary assessment references two engineering drawings, only one of which was included with the packet. The drawing which was included (057140) does not provide information on floor drains from the unit.

CPP-71: This summary assessment also references two engineering drawings, only one of which was provided. The drawing does not show the drainage system from the CPP-655, and it cannot be concluded that there are no floor drains from the work area. Information from the summary assessment for CPP-71 and CPP-70 does not make it clear if CPP-655 had no floor drains in the work

area, or if the statements are meant to say the drains could not drain to the septic system. This point should be verifiable by an inspection of the building and a more comprehensive look into the building history to see if there formerly were floor drains.

CPP-76: This document references three engineering drawings, only one of which is provided. This summary assessment does not contain sufficient information on the history of the unit. The assessment also states that a septic tank was removed during construction. The one engineering drawing provided (135505), states that the cess pool and septic tank are to be abandoned in place.

CPP-77: Revise and resubmit this summary assessment after the sampling data is available.

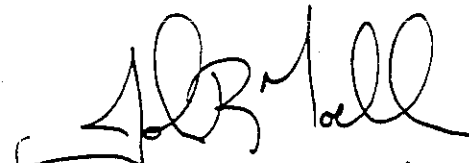
There were other engineering drawings submitted with the ICPP summary assessments, however the drawing numbers did not match the ones referenced in the assessments.

Please contact Jeffry Rodin of EPA Region 10 at FTS 399-2859 if you would like to discuss any of these comments.

Sincerely,

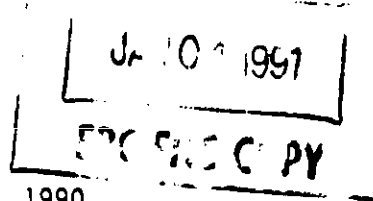


Michael Gearheard, Chief
Waste Management Branch



for Cheryl Koshuta, Director
Idaho Hazardous Material
Bureau

EXHIBIT 7



003128

January 12, 1990

Mr. F. H. Weiler
U. S. Department of Energy
Idaho Operations Office
785 DOE PLACE
Idaho Falls, ID 83402

SUMMARY ASSESSMENT REVIEW LETTER FROM THE EPA/STATE - DJB-09-90

Dear Mr. Weiler:

In response to the letter from the EPA dated October 16, 1989, EG&G and WINCO have the following remarks.

EG&G

Enclosed are seven copies of the supporting information requested for the Summary Assessments for Solid Waste Management Units (SWMU's), ARA-07, ARA-09, and PBF-03, a certified statement of verification of closure activities conducted by Energy Incorporated for SWMU IET-07 and additional information on the history of SWMU ARA-11.

WINCO

The comments pertaining to the Idaho Chemical Processing Plant (ICPP), SWMU's, CPP-41 and CPP-43 both stated that the information provided was insufficient for administrative closure. It was also stated that information requested on CPP-43 in EPA's January 5, 1988 letter was not provided in this revision. The comments also stated that the drawings referenced in the Summary Assessments for CPP-70, 71, 76 and 77 were not submitted with the assessments.

Very little information exists on CPP-41 and CPP-43 since they were in existence in the "early" years of the ICPP (approximately late 1950's to mid 1960's). The information about these units was gathered by interviewing individuals, and many of the interviewee's recollections about units were imprecise. Therefore, little information was available when the Summary Assessments were written. This was denoted in the "Methods of Assessment" sections (see note 2 in Revised Summary Assessment of CPP-41, and note 4 in Revised Summary Assessment of CPP-43.)



P.O. Box 1625 Idaho Falls, ID 83415

EPA's January 5, 1988 letter requested information on 1) where the unit was located under CPP-651, 2) years of operation 3) the likely solvents used during operation and 4) the size of the operation/quantities of waste disposed at CPP-43. Since little is known about the unit, the information requested was unavailable when the Summary Assessment was written. This was stated in note 4 of the "Methods of Assessment" section. The individual interviewed (only one individual could recall the grease pit) stated that the pit was located near the northwest corner of the building, but he was unsure exactly where. He also stated that he was unsure of how long the unit was used, or what the dimensions of the unit were. He also stated that to his knowledge the unit was only used for the disposal of motor oil and grease.

Concerning the drawings referenced in Summary Assessments, all drawings referenced in CPP-70, 71, 76, and 77 are present in the document submitted.

SWMU CPP-41

CPP-41 consists of two pits, one is reported to be beneath the FAST Facility (CPP-666) and the other beneath the Maintenance Building (CPP-663). The exact location of the pits is unknown. WINCO discussed EPA's comments with one of the individuals who interviewed plant personnel for the initial assessment. He stated that the descriptions were in the vein of "... the old fire training pits were out around where CPP-666 and CPP-663 are now located ...," but when asked for more specifics, they were unable to provide any more details. WINCO also reviewed historical photographs of the ICCP and was unable to confirm the locations of the pits.

Although the exact location of the pit near building CPP-666 is not known, the area excavated for the construction was so large the likelihood of any hazardous constituents remaining in the location after construction is nil. CPP-666 is approximately 305 x 125 feet. During construction of the site an area of approximately 500 x 250 was excavated, most of the 40 foot basalt layer. The base slab for the building was poured directly on the basalt. The facility was then constructed on the base slab and the excavation was backfilled around the building foundation.

CPP-663 is approximately 210 x 161 feet. Prior to construction, the area was lower than the surrounding surface grade. Excavated materials from previous construction projects were piled in the area as fill. During construction, the excavated materials were leveled and additional fill materials were brought in to level the surrounding surface grade. During interviews with personnel associated with construction, they stated that they did not remember a pit being in the area prior to construction. Since the exact locations of the pits are not known and extensive site preparation was conducted at each location, it is unlikely that either pit

exists as a unit in its original location and it would be impossible to determine where to conduct sampling for characterization. Therefore, WINCO still recommends that CPP-41 be removed from the "universe of SWMU's" by administrative closure.

SWMU CPP-43

CPP-43 consisted of a grease pit located south of the CPP-637/620 complex. The exact location of the pit could not be determined from interviews conducted during the initial assessment. Only one individual could remember the pit, but he could not remember a specific location or waste type/location. Other employees who worked in the area during the early 1960's were interviewed, but none could substantiate that a grease pit existed in the area.

WINCO has since re-interviewed the individual and reviewed additional historical photographs of the ICPP. The individual was able to locate what he believes to be the pit on an old photograph (photograph #62-7669). WINCO was unable to confirm that the location on the photograph was actually a grease pit. However, if the location indicated by the individual is correct, the pit was located approximately on the northeast corner of the Irradiated Fuel Storage Facility (CPP-651). However, it could not determine from the photograph if the pit was actually under the building or adjacent to the building.

The individual was asked to give his "best guess" on the dates of operation, waste types, and construction of the unit. He stated that he did not remember the dates of operation; however, the photographs (photograph #s 62-7669 and 66-2370) indicate that the pit was in existence in 1962 and was filled in by 1966. He stated that all he could remember being disposed to the pit was automotive oil and possibly small quantities of acid (he stated that he did not remember any other "organics" going into the pit). The individual was still unsure of the dimension of the pit, but stated that he thought that it may have been 18 inches wide by 5-8 feet long by 4-5 feet deep. To his best recollection, he thought that the walls were concrete and the bottom consisted of red fire brick.

Since the information is still inconclusive, WINCO will sample the general location around the northeast corner of CPP-651, if directed to do so.

SWMU's CPP-70, 71, 76, and 77

EPA's letter stated that the drawings referenced in the text were not included in the Summary Assessment. The referenced drawings are present as stated. Some confusion may have arisen from the fact that the drawings are from different years and produced by several different contractors.

Mr. F. H. Weiler
January 12, 1990
DJB-12-90
Page 4

003100

Depending on the time frame and contractor, various numbering systems were used. However, the file numbers cited are included on each drawing. The file numbers that are presently being used are the last six digits in the "Index Code Number" box. These numbers may be stated as "serial" or "drawing" numbers, but in all cases the last six digits are used.

A draft letter which presents the above information has been File Transferred to your secretary, Barbara, for transmittal to the following individuals:

Mr. Michael Gearheard, Chief
Environmental Protection Agency
Waste Management Branch
1200 Sixth Avenue
Seattle, WA 98101

Ms. Cheryl Koshuta, Chief
Hazardous Materials Bureau
State of Idaho
450 West State Street
Boise, ID 83720

If you have any additional questions regarding the content of this letter, feel free to contact me at 526-1996.

Very truly yours,



David J. Blumberg
INEL COCA Coordinator

tlm

Enclosure(s):
As Stated

cc: S. A. Morreale, DOE-ID
W. N. Sato, DOE-ID
A. J. Matule, WINCO
+ ~~_____~~ WINCO
L. P. Leach, EG&G Idaho
R. R. Stiger, EG&G Idaho
J. O. Zane, EG&G Idaho

LETTER FILE TRANSFERRED TO BARBARA

Mr. Michael Gearheard, Chief
Waste Management Branch
1200 Sixth Avenue
Seattle, WA 98101

Dear Mr. Gearheard:

In response to the letter from the EPA dated October 16, 1989, EG&G and WINCO have provided the following remarks.

EG&G

Enclosed is the supporting information requested for the Summary Assessments for Solid Waste Management Units (SWMU's), ARA-07, ARA-09, and PBF-03 and a copy of a certified statement of verification of closure activities conducted by Energy Incorporated for SWMU IET-07. Additional information on the history of SWMU ARA-11 is being compiled and will be transmitted at a later date.

WINCO

The comments pertaining to the Idaho Chemical Processing Plant (ICPP), SWMU's, CPP-41 and CPP-43 both stated that the information provided was insufficient for administrative closure. It was also stated that information requested on CPP-43 in EPA's January 5, 1988 letter was not provided in this revision. The comments also stated that the drawings referenced in the Summary Assessments for CPP-70, 71, 76, 77 were not submitted with the assessments.

Very little information exists on CPP-41 and CPP-43 since they were in existence in the "early" years of the ICPP (approximately late 1950's to mid 1960's). The information about these units was gathered by interviewing individuals, and many of the interviewee's recollections about units were imprecise. Therefore, little information was available when the Summary Assessments were written. This was denoted in the "Methods of Assessment" section (see note 2 in Revised Summary Assessment of CPP-41 and note 4 in Revised Summary Assessment of CPP-43).

EPA's January 5, 1988 letter requested information on 1) where the unit was located under CPP-651, 2) years of operation, 3) the likely solvents used during operation, and 4) the size of the operation/quantities of waste disposed at CPP-43. Since little is known about the unit, the information requested was stated in note 4 of the "Methods of Assessment" section. The individual interviewed (only one individual could recall the grease pit) stated that the pit was located near the northwest corner of the building, but he was unsure exactly where. He also stated that he was unsure of how long the unit was used, or what the dimensions of the unit were. He also stated that to his knowledge the unit was only used for the disposal of motor oil and grease.

Concerning the drawings referenced in the Summary Assessments, all drawings reference in CPP-70, 71, 76, and 77 are present in the document submitted.

SWMU CPP-41

CPP-41 consists of two pits, one is reported to be beneath the FAST Facility (CPP-666) and the other beneath the Maintenance Building (CPP-663). The exact location of the pits is unknown. WINCO discussed EPA's comments with one of the individuals who interviewed plant personnel for the initial assessment. He stated that the descriptions were in the vein of "... the old fire training pits were out around were CPP-666 and CPP-663 are now located ...," but when asked for more specifics, they were unable to provide any more details. WINCO also reviewed historical photographs of the ICPP and was unable to confirm the locations of the pits.

Although the exact location of the pit near building CPP-666 is not known, the area excavated for the construction was so large the likelihood of any hazardous constituents remaining in the location after construction is nil. CPP-666 is approximately 305 x 126 feet. During construction of the site an area of approximately 500 x 250 was excavated, most to the 40 foot basalt layer. The base slab for the building was poured directly on the basalt. The facility was then constructed on the base slab and the excavation was backfilled around the building foundation.

CPP-663 is approximately 210 x 161 feet. Prior to construction, the area was lower than the surrounding surface grade. Excavated materials from previous construction projects were piled in the area as fill. During construction, the excavated materials were leveled and additional fill materials were brought in to level the surrounding surface grade. During interviews with personnel associated with construction, they stated that they did not remember a pit being in the area prior to construction.

Since the exact locations of the pits are not known and extensive site preparation was conducted at each location, it is unlikely that either pit exists as a unit in its original location and it would be impossible to determine where to conduct sampling for characterization. Therefore, WINCO still recommends that CPP-41 be removed from the "universe of SWMU's" by administrative closure.

SWMU CPP-43

CPP-43 consisted of a grease pit located south of the CPP-637/620 complex. The exact location of the pit could not be determined from interviews conducted during the initial assessment. Only one individual could remember the pit, but he could not remember a specific location or waste type/location. Other employees who worked in the area during the early 1960's were interviewed, but none could substantiate that a grease pit existed in the area.

WINCO has since re-interviewed the individual and reviewed additional historical photographs of the ICPP. The individual was able to locate what he believes to be the pit on an old photograph (photograph #62-7669). WINCO was unable to confirm that the location on the photograph was actually a grease pit. However, if the location indicated by the individual is correct, the pit was located approximately on the northeast

corner of the Irradiated Fuel Storage Facility (CPP-651). However, it could not be determined from the photograph if the pit was actually under the building or adjacent to the building.

The individual was asked to give his "best guess" on the dates of operation, waste types, and construction of the unit. He stated that he did not remember the dates of operation; however, the photographs (photograph #s 62-7669 and 66-2370) indicate that the pit was in existence in 1962 and was filled in by 1966. He stated that all he could remember being disposed to the pit was automotive oil and possibly small quantities of acid (he stated that he did not remember any other "organics" going into the pit). The individual was still unsure of the dimension of the pit, but stated that he thought that it may have been 18 inches wide by 5-8 feet long by 4-5 feet deep. To his best recollection, he thought that the walls were concrete and the bottom consisted of red fire brick.

Since the information is still inconclusive, WINCO will sample the general location around the northeast corner of CPP-651, if directed to do so.

SWMU's CPP-70, 71, 76, and 77

The EPA/State letter stated that the drawings reference in the text were not included in the Summary Assessment. The referenced drawings are present as stated. Some confusion may have arisen from the fact that drawings are from different years and produced by several different contractors.

Depending on the time frame and contractor, various numbering systems were used. However, the file numbers cited are included on each drawing. The file numbers that are presently being used are the last six digits in the "Index Code Number" box. These numbers may be stated as "serial" or "drawing" numbers, but in all cases, the last six digits are used.

DOE-ID looks forward to your review of this information and anticipates that this information will be sufficient to allow elimination of these SWMU's from the universe of SWMU's. If you have any questions about this information, feel free to contact Hunter Weiler at 208-526-0601, Dave Blumberg at 208-526-1996, or Gerry Sehlke at 208-526-3008.

Sincerely

J. E. Solecki

Attachments:
As Stated

cc: Cheryl Koshuta, State of Idaho (w/Attach)
G. Sehlke, WINCO (w/o Attach)
D. J. Blumberg, EG&G Idaho (w/o Attach)

J. H. Barry
J. E. Solecki

G. C. Bowman
F. H. Weiler

D. N. Rasch

W. N. Sato

EXHIBIT 8

RADIOLOGICAL EVALUATION

1. Only oils and greases were discharged to the Grease Pit South of CPP-627 and did not involve the discharge of radioactive materials.
2. No radioactive contamination of the surface areas on or near the location of CPP-43 have been identified on surveys.¹

¹ April 1991 Radiologic Survey Map, ICPP-A-17-407, Appendix C

